

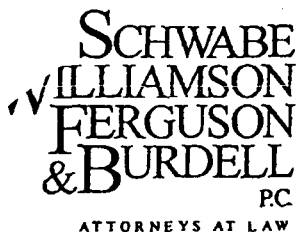
US Bank
Documents Produced to the
U.S. Environmental Protection Agency
On April 24, 2008
Pursuant to the 104(e) Request

**Letters between Jim Hanken and the
Washington Natural Gas Co.**

USEPA SF



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U.S. BANK CENTRE, SUITE 3400
1420 FIFTH AVENUE ■ SEATTLE, WASHINGTON 98101-2339
TELEPHONE: 206 622-1711 ■ FAX: 206 292-0460 ■ TELEX: 320382

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Courp.*

JAMES C. HANKEN

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JUL 21 1995

LTM

July 18, 1995

30695-1-20

Washington Natural Gas Co.
815 Mercer Street
Seattle, WA 98109

Gentlemen:

This office represents Quendall Terminals, the owner of the former Reilly Tar & Chemical site at 4503 Lake Washington Boulevard in northern Renton. This site has been identified as a site in which hazardous materials were released into the environment by the Washington State Department of Ecology.

In 1988 Quendall Terminals entered into a Consent Decree with Ecology to perform a groundwater assessment. That assessment was deemed completed with the issuance of an Agreed Order between Quendall Terminals and Ecology in September, 1993. In response to the Agreed Order, Quendall Terminals retained an environmental consulting firm, Hart Crowser, to perform the remedial investigation, risk assessment, and feasibility study. This extensive site investigation is still on-going.

1. Our investigation reveals that the source of much of the hazardous material that was released on the site was transported there from the Seattle Gas Works operation on Lake Union.

2. Additionally, our investigation reveals that the characteristics of the hazardous substances located in the ground and groundwater are consistent with characteristics of coal, oil, and water-gas tar.

3. It is our understanding that Washington Natural Gas is a successor in interest to the corporate operators of the Seattle Gas Works facility.

Based on the foregoing, we believe that Washington Natural Gas is a potentially liable party under MTCA and a potentially responsible party under CERCLA. We are in the process of

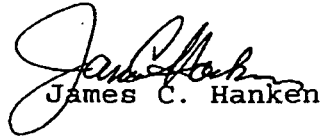
Washington Natural Gas Co.

July 18, 1995

Page 2

identifying all such contributors at the site. We believe it is in your best interests to contact us and take appropriate action. Otherwise, we believe that it is appropriate to submit Washington Natural Gas to the Department of Ecology as an additional PLP to be named at the site.

Sincerely,


James C. Hanken

JCH/k

cc: Quendall Terminals
Lynn Manolopoulos
Seth Goldberg



Steven R. Secrist
Attorney

July 31, 1995

James C. Hanken, Esq.
Schwabe Williamson Ferguson & Burdell
U.S. Bank Centre, Suite 3400
1420 Fifth Avenue
Seattle, WA 98101-2339

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AUG 6 1995

Schwabe, Williamson, Ferguson & Burdell

Re: Quendall Terminals

32695-1-20

Dear Mr. Hanken:

I am in receipt of your letter dated July 18, 1995. As I indicated in the phone message I left for you on July 24th, your letter is the first notice that Washington Natural Gas Company ("WNG") has had regarding this site. As such, it is impossible for us to provide an informed response without collecting additional information and data.

Therefore, I am writing to solicit additional information regarding the Quendall Terminals Site including, but not limited to, the following information:

1. Please provide an explanation of the operations of the former Reilly Tar & Chemical Site;
2. Please provide copies of the Consent Decree and Agreed Order between Quendall Terminals and Ecology;
3. please provide copies of reports prepared by Hart Crowser including those referenced in your letter (Remedial Investigation, Risk Assessment, and Feasibility study);
4. Please provide the information you relied upon to substantiate your claim that, "the source of much of the hazardous material that was released on the site was transported from Seattle Gas Works Operation on Lake Union";
5. Please provide the information and data substantiating your claim that, "these hazardous substances located in the ground and groundwater are consistent with characteristics of coal, oil and water-gas tar";
6. Please provide information to help us identify the area in which this facility operates (e.g. Sanborn maps).

Washington Natural Gas Company
815 Mercer Street (P.O. Box 1869), Seattle, Washington 98111. (206) 464-1999, 1-800-999-4964

James C. Hanken, Esq.
July 31, 1995
Page Two

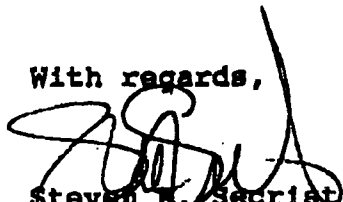
For purposes of our investigation, I am assuming, based upon your letter, that this remediation is limited to soil and groundwater. If there are any additional known or anticipated requirements of the remediation (e.g. sediments in Lake Washington) please advise.

Upon receipt of the aforementioned information and other information which you believe would be useful for WNG to consider the performance of an investigation, please forward it to me. Upon receipt, I will in fact proceed with investigation and then provide you with WNG's position with respect to this site.

Thank you for your assistance. Obviously, this letter is not intended nor should it be construed as a confession of liability or obligation in any fashion whatsoever by WNG. Rather, this is purely a solicitation for information in response to a claim submitted by you on behalf of Quendall Terminals which will be used by WNG in part to determine the merit of the claim and develop an appropriate response.

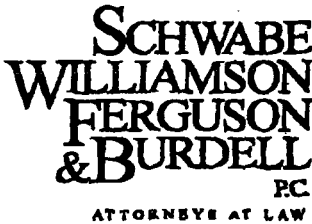
Your cooperation is appreciated. If you have any additional questions please free to direct them to my attention.

With regards,



Steven R. Secrist
Staff Attorney

SRS:jcv



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JAMES C. HANKEN

November 2, 1995

Mr. Steven R. Secrist, Staff Attorney
Washington Natural Gas
815 Mercer Street
P. O. Box 1819
Seattle, WA 98111

Re: Quendall Terminals

Dear Mr. Secrist:

I apologize for the delay in responding to your July 31, 1995 letter. In response to your request for information, enclosed please find the following: The Consent Decree/Agreed Order with the Department of Ecology, and the Draft Work Plan for Remedial Investigation/Risk Assessment/Feasibility Study (RI/FS) prepared by Hart Crowser.

The RI/FS provides an explanation of the operations at the Reilly Tar site at pages 2-4, and a site map at Figure 1-1. The RI/FS also shows that Seattle Gas Works was the source of much of the hazardous material that was released at the site. See e.g., page 3 and Appendix A (3/16/83) (interview with Ward Roberts and Bob Johnson). In addition, the report states that the contaminants at the site are consistent with characteristics of coal, oil and water tar products. See pages 5-6, 11-13.

There is a great deal of additional information that we have gathered regarding the site which is too voluminous to send at this time. Most of the information came from the Department of Ecology and is available to you there. We would also be willing to make copies available at our offices for your review. If you have any further questions, please do not hesitate to contact me.

Sincerely,

James C. Hanken

JCH/k
Enclosures

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